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July 10, 2025

**Via ECF**

The Honorable John P. Cronan  
U.S. District Court for the Southern District of New York  
500 Pearl Street, Room 1320  
New York, NY 10007

**Re: *GMO Gamecenter USA, Inc. and GMO Internet Group, Inc. v. Whinstone US, Inc., No. 1:22-cv-5974 (S.D.N.Y.)***

Dear Judge Cronan:

We write on behalf of Whinstone US, Inc. (“Whinstone”) in accordance with Rule 4.B.ii of the Court’s Individual Rules and Practices in Civil Cases to request permission to file a redacted copy of Whinstone’s Objection to Magistrate Judge Parker’s Discovery Order (the “Objection”) on the public docket. The Objection concerns documents protected from disclosure by the attorney-client privilege and the work-product doctrine. Whinstone respectfully requests permission to redact the portions of the Objection that quote from and reference the protected information. Whinstone will email the Court an unredacted version of the Objection, along with the documents at issue, for in camera review.

Respectfully submitted,

/s/ Brandon Fetzer  
Brandon Fetzer  
bfetzer@debevoise.com

The request is granted. The Court finds this limited sealing warranted under *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006).

SO ORDERED  
July 11, 2025  
New York, New York

  
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JOHN P. CRONAN  
United States District Judge